

STROOCK & STROOCK & LAVAN LLP  
JULIA B. STRICKLAND (State Bar No. 83013)  
STEPHEN J. NEWMAN (State Bar No. 181570)  
BRIAN C. FRONTINO (State Bar No. 222032)  
A. R. KACHADOORIAN (State Bar No. 240601)  
JEFFREY B. BELL (State Bar No. 269648)  
2029 Century Park East  
Los Angeles, CA 90067-3086  
Telephone: 310-556-5800  
Facsimile: 310-556-5959  
Email: lacalendar@stroock.com

Attorneys for Defendant  
TRANS UNION LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SERGIO L. RAMIREZ, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

) Case No. 3:12-cv-00632-JSC

) [Assigned to the Honorable Jacqueline Scott  
) Corley]

) **STIPULATION AND [PROPOSED]**  
) **ORDER AMENDING BRIEFING**  
) **SCHEDULE**

STIPULATION AND [PROPOSED] ORDER  
AMENDING BRIEFING SCHEDULE  
Case No. 3:12-cv-00632-JSC

WHEREAS, on August 1, 2012, defendant Trans Union, LLC (“Trans Union”) filed a Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c) and to Strike Pursuant to Fed. R. Civ. P. 12(f) (the “Motion”);

WHEREAS, pursuant to Civil Local Rule 7-3(a), the Opposition of plaintiff Sergio L. Ramirez (“Plaintiff”) to the Motion is due not later than August 15, 2012;

WHEREAS, pursuant to Civil Local Rule 7-3(c), Trans Union’s Reply in support of the Motion is due not later than August 22, 2012;

WHEREAS, the Motion is set for hearing on October 11, 2012;

WHEREAS, to allow the parties sufficient time to prepare their Opposition and Reply papers, and because Plaintiff’s counsel has a vacation scheduled for mid-August, the parties agree that a brief continuance of the foregoing dates is appropriate;

WHEREAS, pursuant to Local Rules 6-1(b) and 6-2, the parties may request an order changing time that would affect the date of an event or deadline already fixed by Court order;

WHEREAS, the parties previously stipulated to the extension of the date by which Trans Union was required to respond to the initial Complaint on March 7, 2012, March 16, 2012 and March 29, 2012;

WHEREAS, this Stipulation is made in good faith and not for purposes of delay;

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that:

1. The date by which Plaintiff must file his Opposition to the Motion is continued from August 15, 2012 to September 7, 2012;

2. The date by which Trans Union must file its Reply in support of the Motion is continued from August 22, 2012 to September 21, 2012;

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3. The hearing date on the Motion shall remain October 11, 2012.

IT IS SO STIPULATED

Dated: August 1, 2012

STROOCK & STROOCK & LAVAN LLP  
JULIA B. STRICKLAND  
STEPHEN J. NEWMAN  
BRIAN C. FRONTINO  
A. R. KACHADOORIAN  
JEFFREY B. BELL

By: /s/ Jeffrey B. Bell  
Jeffrey B. Bell

Attorneys for Defendant  
TRANS UNION LLC

Dated: August 1, 2012

ANDERSON, OGILVIE & BREWER, LLP  
ANDREW J. OGILVIE  
CAROL MCLEAN BREWER

FRANCIS & MAILMAN, P.C.  
JOHN SOUMILAS

By: /s/ John Soumilas  
John Soumilas

Attorneys for Plaintiff  
SERGIO L. RAMIREZ

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2012

\_\_\_\_\_  
Hon. Jacqueline Scott Corely  
United States District Court Judge

STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East  
Los Angeles, California 90067-3086

STIPULATION AND [PROPOSED] ORDER  
AMENDING BRIEFING SCHEDULE  
Case No. 3:12-cv-00632-JSC

**DECLARATION OF JEFFREY B. BELL**

I, Jeffrey B. Bell, hereby declare as follows:

1. I am admitted to practice before this Court and am associate at Stroock & Stroock & Lavan LLP ("Stroock"), counsel for defendant Trans Union, LLC in this action. I submit this Declaration in support of the Stipulation and [Proposed] Order Amending Briefing Schedule (the "Stipulation"), in accordance with Section X.B. of General Order 45 and Civil Local Rule 5-1(i)(3) of this Court. The facts set forth herein are true of my own personal knowledge. If called as a witness, I could and would competently testify thereto.

2. On August 1, 2012, John Soumilas, counsel for plaintiff Sergio L. Ramirez, contacted me by e-mail and approved the content of the Stipulation, which was sent to him for his review and approval on July 31, 2012, and authorizing me to execute it on his behalf.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this August 1, 2012.

\_\_\_\_\_  
/s/ Jeffrey B. Bell  
Jeffrey B. Bell

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2012, a copy of the foregoing **STIPULATION AND [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE** was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

\_\_\_\_\_  
/s/ Jeffrey B. Bell  
Jeffrey B. Bell

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